



KENT COUNTY URBAN COUNTY

**CONSOLIDATED STRATEGY AND PLAN:
SUBSTANTIAL AMENDMENT TO THE FY 2012-2013
ANNUAL ACTION PLAN**

DRAFT: 4/4/14





Substantial Amendment to the FY 2012-2013 Annual Action Plan

A. GENERAL SUMMARY

This substantial amendment to the fiscal year 2012-2013 Annual Action Plan summarizes the goals and objectives for the Emergency Solutions Grant (ESG) funding that comes directly to Kent County from the U.S. Department of Housing & Urban Development (HUD) to meet community needs for the jurisdictions currently participating in Kent County Urban County. The Kent County Urban County must respond to the requirements as provided by HUD through the HEARTH Act regulations.

In order to be compliant with the Consolidated Planning Regulations, HEARTH Act Regulations, and the Emergency Solutions Grant Program, this amendment provides a detailed explanation for the purposes of the second allocation. Each section corresponds to the outline as it is currently written in the federal registrar. Unless specifically referenced and directly changed within this substantial amendment, all other components to the FY 2012-2013 Annual Action Plan remain the same.

A. Requirements for Preparation

1. Consultation

- Consult with the Continuum of Care within the geographic area on:
 - determining how to allocate ESG funds for eligible activities;
 - developing the performance standards for activities funded under ESG; and
 - developing funding, policies, and procedures for the operation and administration of the HMIS.

On February 27th Kent County staff met with the Continuum of Care Core Partner's group in order to present the Emergency Solutions Grant (ESG) proposal/process for application and on March 21st, the Continuum of Care steering committee extended unanimous support for the County's Substantial Amendment.

The CoC membership is comprised of agencies and organizations that provide direct services to households experiencing a housing crisis, other related service organizations that engage directly or indirectly with households that experience a housing crises, and homeless or formerly homeless individuals. The CoC membership covers a broad spectrum of community partners such as nonprofit homeless assistance providers, victim services providers, faith-based organizations, government entities, businesses, advocates, public housing authorities, school districts, social services providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations serving veterans, and homeless or formerly homeless individuals.

The County consulted with the CoC within the geographic area of Kent County and will utilize the CoC funding priorities to allocate ESG funds for eligible activities. Funding priorities as adopted by the CoC include:

Prevention: Programs that prioritize households with the most intense housing crisis that are “at risk” of homelessness and will utilize a diversion approach, preventing individuals and families from moving into emergency shelter, the streets or places not meant for human habitation.

Rapids Re-housing: Programs that reduce the length of homelessness by placing homeless households with many barriers to housing stability in housing within 20 days of program entry.

Strengths Based-Housing First Services: Program model that incorporates the evidenced based practices of Housing First and Strength Based services.

Homeless Management Information System (HMIS): A maximum amount of 5% (five percent) of the allocation may be used for the operation of the HMIS.

2. Citizen Participation

- Follow existing citizen participation plan for completing a substantial amendment.

The County of Kent will hold a public hearing prior to the submission of any substantial amendments to its HUD-approved planning document/funding application. The requirements shall focus on providing a reasonable opportunity for citizens, public agencies and other interested parties to examine and submit comments pertaining to the proposed planning document and funding application. This public hearing shall be held only after a summary of the proposed planning document and funding application, along with a notice of the date, time and location of the public hearing, is published in the Grand Rapids Press. This notice shall be published at least thirty (30) days prior to the public hearing date. Copies of the proposed planning document and funding application shall be available for public inspection and review during the thirty (30) day period prior to the public hearing. A summary of the views and comments received during the review period and at the public hearing, and a summary of any views and comments not accepted and the reasons therefore, shall be prepared by the County of Kent and attached to the final planning document and funding application submitted to HUD.

B. Required Contents of Substantial Amendments

- 1. SF-424** Please see following page.

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2. Summary of Consultation Process

- *Describe how the recipient consulted with the Continuum(s) of Care on:*
 - *determining how to allocate ESG funds for eligible activities;*
 - *developing the performance standards for activities funded under ESG; and*
 - *developing funding, policies, and procedures for the operation and administration of the HMIS.*

On February 27th Kent County staff met with the Continuum of Care Core Partner's group in order to present the Emergency Solutions Grant (ESG) proposal and process for application and on March 21st, the Continuum of Care steering committee extended unanimous support for the County's Substantial Amendment.

The County worked in tandem to mirror the Continuum of Care's community priorities for determining allocation of ESG funds to eligible activities. The County remains committed to adherence of the performance standards developed for funded activities under ESG. Additionally, Kent County will continue to work with the Continuum of care to develop funding, policies, and procedures for the operation and administration of the HMIS. As a Community the CoC has determined the following allocation for Kent County 7.5% Admin, 32.5% Prevention, 57% Rapid Rehousing and 3% Homeless Management Information System.

Recent data refines the County's homeless population's characteristics, noting that 1 in 3 people experiencing homelessness are in families and 1 in 4 are children. Concurrently, the County has seen an increase in the number of homeless families in the system.

The local HMIS is administered County-wide. Providers are committed to using the system and submit monthly and annual progress reports. The system is used to generate reports for all types of information, in particular our point in time.

As required by the

3. Summary of Citizen Participation Process

- Summarize citizen participation process used;
- Summarize the public comments or views received; and
- Summarize the comments or views not accepted and include the reasons for not accepting those comments or views.

In accordance with the County of Kent Citizen's Participation Process the County will hold a public hearing prior to the submission of any substantial amendments to its HUD-approved planning document/funding application.

This public hearing shall be held only after a summary of the proposed planning document and funding application, along with a notice of the date, time and location of the public hearing, is published in the Grand Rapids Press. This notice shall be published at least thirty (30) days prior to the public hearing date (April 5, 2014). Copies of the proposed planning document and funding application shall be available for public inspection and review during the thirty (30) (April 1-May 5, 2014) day period prior to the public hearing (May 5, 2014).

A summary of the views and comments received during the review period and at the public hearing, and a summary of any views and comments not accepted and the reasons therefore, shall be prepared by the County of Kent and attached to the final planning document and funding application submitted to HUD.

4. Match

- Describe:
 - Types of cash and/or non-cash resources used as match
 - Specific amounts of resources used as match
 - Proposed uses of match resources

In accordance with 24 CFR 576.201, program regulations require the recipient or sub-recipient to match the allocation with an equal amount of funding from federal, state or local resources. The sub-recipient, intends to match the \$125,812 of the ESG dollars with In-kind _____, Cash _____ and Other _____.

Activity Type	ESG	Matching Funds		
		Cash	In-Kind	Other
Rapids Re-housing	\$71,712.84			
Prevention	\$40,888.90			
Admin	\$ 9,435.90			
HMIS	\$ 3,774.36			

4. Proposed Activities and Overall Budget

Proposed Activities

County of Kent Homeless Programs

Rapid Re-housing Activities

Priority Need: High
 Description of Activity: Provide for Rapid Re-housing Activities
 Proposed Accomplishments: Assisting 16 homeless persons to move into permanent stable housing
 ESG Funding: \$71,712.84
 Match Funding: \$71,712.84
 Objective: Decent Affordable Housing
 Outcome: Affordability
 Start Date: Upon Grant Execution
 Completion Date:
 Location: County-wide (Out County)
 Performance Indicators: **Refer to Attachment 1**

Priority Need: High
 Description of Activity: Provide for Homeless Prevention Activities
 Proposed Accomplishments: Assisting 10 homeless persons to move into permanent stable housing
 ESG Funding: \$40,888.90

Match Funding:	\$40,888.90	
Objective:	Decent Affordable Housing	
Outcome:	Affordability	
Start Date:	Upon Grant Execution	
Completion Date:		
Location:	County-wide (Out County)	
Performance Indicator:		Refer to Attachment 1

Discussion of Funding Priorities

Explain why the recipient chose to fund the proposed activities at the amounts specified (recommended: if available, use locally relevant data to support the funding priorities, and explain how the funding priorities will support the national priorities established in Opening Doors: Federal Strategic Plan to Prevent and End Homelessness). Identify and any obstacles to addressing underserved needs in the Community.

The County plans to use its allocation to fund Rapids Re-housing and Homeless prevention activities, distributing the available amount on a 60%, 40% respectively. This distribution is being made to comply with local CoC and HUD requirements. The County concurs with HUD's analysis that using ESG funds for rapid re-housing efforts is very effective because it guarantees the immediate end to homelessness for a segment of extremely low-income and households and shortens their length of stay in shelter. This activity will support the national goal of preventing and ending homelessness for families, in 10 years, while furthering the national objective number 3 of providing affordable housing to people experiencing or most at risk of homelessness as identified in "Opening Doors the Federal Strategic Plan to Prevent and End Homelessness" (p. 30).

The County anticipates several obstacle in addressing underserved needs including: 1) funding for social services at the federal, state, and local levels are declining and consequently, establishing on-going support services for persons who are on the verge of homelessness or formerly homeless is difficult; 2) unemployment levels in Michigan continue to be some of the highest in the nation and lack of employment is a key factor in a person's ability to retain housing; 3) there is also a limited supply of affordable housing units in Kent County.

a. Table 3: FY 2014 Detailed Budget Table

		FY 2014			
		<u>Emergency Shelter Grants/Emergency Solutions Grants</u>			
ESG Grant Amount	\$125,812.00	<u>Program Allocations</u>			
Total Administration	\$9,345.90				
		Allocation			Total Fiscal Year 2014
	Eligible Activities		Proposed Activity Amount	Reprogrammed Amount	Activity Amount
	HMIS		\$3,774.36	\$0.00	\$0.00
	Rapid Re-housing		\$71,712.84	\$0.00	\$0.00
	<i>Housing Relocation and Stabilization</i>		\$0.00	\$0.00	\$0.00
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Homelessness Prevention		\$40,888.90	\$0.00	\$0.00
	<i>Housing Relocation and Stabilization</i>		\$0.00	\$0.00	\$0.00
Emergency Solutions Grants Program	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	<i>Administration</i>		\$9,345.90	\$0.00	\$0.00
	Emergency Solutions Grants Total		\$125,812.00	\$0.00	\$0.00
			Total Grant Amount:		
			\$125,812	\$0.00	\$0.00

B6. WRITTEN STANDARDS FOR PROVISION OF ESG ASSISTANCE

- *If the recipient is a metropolitan city, urban county, or territory: include written standards for providing the proposed assistance.*
- *If the recipient is a state: include written standards for providing the proposed assistance **or** describe the requirements for subrecipients to establish and implement written standards*

The written standards must include:

- a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.*

To be eligible for ESG assistance, all households must meet the homeless definitions that apply to the eligible type of ESG activity, such as rapid re-housing (24 CFR 576.2 Definitions) and the "at risk of Homelessness definition" (24 CFR 576.103)

In order to be consistent with the homeless definitions used by other Continuum of Care funded projects, at this time the County will not serve individuals and families qualifying under Homeless

Rapid re-housing participants must be qualified under Category 1, literally homeless individuals and families currently living in an emergency shelter, in places not meant for human habitation or Category 4, Persons fleeing or attempting to flee domestic violence. (24 CFR 576.2) Projects serving individuals or families qualified under Category 4 (persons fleeing or attempting to flee violent situations) must follow all related Federal and state laws, follow confidentiality policies, and provide specific services to meet the safety and special needs of this population.

Prevention Participants must be individuals and families at risk of homelessness. Specifically, this includes those that meet the criteria under the "at risk" of homelessness definition at 576.2 as well as those who meet the criteria in paragraphs (2), (3) and (4) of the "homeless definition" also found at 576.2.- and have an annual income below 30 percent of family median income for the area.

Priority will be given to Prevention Participants that are seeking emergency shelter at the CoC coordinated entry point and can be diverted from shelter as a result of ESG assistance.

All participants will be screen and referred to ESG services by the coordinated entry for the CoC

- b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.*

Coordination with CoC

Coordination with other Service providers

The County through involvement with the Continuum of Care has been engaged in planning activities to increase systems coordination among the various housing and service providers to improve access for clients and to better target funding and efforts to address the housing and service needs in our community. As a result there is an established Coordinated entry program, The Salvation Army Booth Family Services, Housing Assessment Program that is utilized for referrals to shelters and other homeless service providers. The County and ESG sub-recipients will coordinate and integrate, to the maximum extent practical, ESG funded activities with mainstream housing, health, social services, employment, education, and youth programs, including those in 24 CFR 576.440(b) and (c). ESG funded projects will be expected to coordinate and integrate with County or Continuum of Care initiatives or other efforts to improve coordination with mainstream resources, which includes those noted in 24 CFR 576.440(b)

Coordination with COC

KCCD is an active member of and consulted with the local Continuum of Care and has coordinated and participated in local decisions regarding how to allocate ESG funds for eligible activities, developing performance standards for ESG assisted projects, and evaluation of outcomes for ESG assisted projects and developing funding, policies, and procedures for the administration and operation of the Homeless Management Information System (HMIS)

Through Local collaboration Kent County has decided to allocate ESG funding for the following, Homeless Prevention, Rapid Rehousing, HMIS and Admin. The CoC has decided to not utilize ESG funding for emergency shelter activities or outreach activities.

This was decided based on consideration of the use of other local resources the limited amount of new ESG funding available and how to strategically and efficiently target these resources. Additionally, Kent County has decided to limit the use of ESG funding allocated to prevention to no more than 40% of ESG funding due to HUD's strong encouragement that jurisdictions target new funds to rapid re-housing. In choosing to utilize a portion of ESG funding for Prevention, Kent County will fund prevention programs that focus on shelter diversion to help ensure resources are used as strategically and cost effectively as possible.

Current local models for ESG service delivery were considered and the effectiveness of the Strengths-Based Housing Resource Specialist Model used locally and supported by the CoC as the standard for Case management services will continue to be used in the delivery of ESG as this model has proven effective in achieving rapid re-housing and prevention outcomes. This model also has CoC established performance standards that will be utilized for ESG funding. KCCD has also been part of the ongoing development of the local HMIS policies and procedures through participation in the CoC Steering Committee. Updates to HMIS policies and procedures are vetted through the CoC sub-committees and brought back to the Steering council for final decision and implementation. Kent County will follow the established procedures for the CoC in the entering of ESG data into the HMIS system through its sub-recipients. KCCD will continue to consult with the Continuum of Care regarding HMIS through the CoC process

- c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.*

- d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.*
- e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.*
- f. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.*

All households will be screened by the CoC coordinated entry point for eligibility and referral to the appropriate services to meet their needs.

All individuals or families will be evaluate by a Housing Resource Specialist to determine eligibility for ESG assistance, and to determine the amount and types of assistance needed to regain stability in permanent housing. A strengths-Based Housing Plan will be developed identifying households strengths and needs across life domains. A progressive engagement model will be utilized providing the least amount of assistance necessary to promote housing stability.

Individuals and families receiving rapid re-housing assistance will be re-evaluated at least annually.

Annual income, if documentation is required, must be determined according to 24 CFR 5.609.

All individual and families must be evaluated to determine that they lack the resources and social networks to obtain or sustain housing without ESG assistance.

Up to 24 months of rental assistance may be provided during any 3-year period, including a one-time payment of rental arrears.

Households may not receive more than \$4,500.00 of rental assistance excluding cost for housing relocation and stabilization services.

Individuals and families may receive up to 24 months of housing stability services to help them obtain and sustain housing stability. Services may be provided consecutively or intermittently, as need to maintain housing stability.

Financial Assistance and housing stability services must be in compliance with 24 CFR 576.104, 24 CFR 576.105, 24 CFR 576.106 and 24 CFR 576.400.

Households will be provided with funding to the degree needed to regain or maintain permanent housing. A progressive engagement approach must be utilized.

B7. DESCRIBE PROCESS FOR MAKING SUB-AWARDS

The process for HUD ESG allocations were determined through a collective decision within the Continuum of Care. The County of Kent is recommending the award of the Emergency Solutions Grant dollars to _____ based on the _____ existent and established network of partner agencies who facilitate the intake process and the agency's thorough knowledge of the necessary case management required for rapid re-housing and homelessness prevention activities.

B8. HOMELESS PARTICIPATION REQUIREMENT

- *For those recipients who cannot meet the participation requirement in § 576.405(a), the substantial amendment must include a plan that meets the requirements under § 576.405(b).*

Pursuant to 24 CFR 576.405 (a), the Continuum of Care governing body currently includes the participation of over 40 agencies that provide direct services to households experiencing a housing crisis, other related service organizations that engage directly or indirectly with households that experience a housing crisis, and homeless and/or formerly homeless individuals. Homeless participants are considered key stakeholders and have an equal opportunity as other members to provide input to the design of the homelessness system of care and this substantial amendment.

B9. PERFORMANCE STANDARDS

- *The recipient must describe the performance standards for evaluating ESG activities, which must be developed in consultation with the Continuum(s) of Care.*

The performance for evaluating the use of the ESG activities have been developed with the cooperation of the CoC. Based on the funding available under both activities-Rapid re-housing and Homeless prevention. The County projects that 16 persons will exit homelessness and another 10 will avoid homelessness under the grant.

The County will adhere to standards developed by the local CoC and HUD:

- Monitor the number of households assisted who return to shelters after Homelessness prevention or Rapids re-housing Assistance is provided
- Monitor the number of households that are assisted directly form the shelter;
- Based on need, ensure that 100% of clients are being referred to other appropriate supportive services in the community;
- Leverage programmatic dollars by ensuring that assisted clients are contributing towards their recovery from homelessness.

B10. CERTIFICATIONS

To be inserted prior to submission of amendment to HUD as attachments to this document.

Certifications are attached.

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C. WRITTEN STANDARDS REQUIRED FOR RECIPIENTS WHO ARE ELIGIBLE AND DECIDE TO USE PART OF THE SECOND ALLOCATION OF FY 2011 FUNDS FOR EMERGENCY SHELTER AND STREET OUTREACH

Per federal and state guidance and emphasis to prioritize ESG awards on homelessness prevention and rapid re-housing activities, the second allocation of ESG funds will not be used to fund emergency shelter or street outreach activities.

D. REQUIREMENTS FOR RECIPIENTS WHO PLAN TO USE THE RISK FACTOR UNDER PARAGRAPH (1)(III)(G) OF THE "AT RISK OF HOMELESSNESS" DEFINITION

- *If recipient plans to serve persons "at risk of homelessness," based on the risk factor "otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness:" describe specific characteristics associated with instability and increased risk of homelessness.*

The County of Kent plans to utilize the risk factor in 24 CFR 576.2, under paragraph (1)(iii)(G) of the "at Risk of Homelessness" definition: "otherwise lives in housing that had characteristics associated with instability and an increased risk of homelessness"

The County of Kent will be addressing the other six conditions in the "at risk homelessness" definition in 24 CFR 576.2 definitions.

E. REQUIREMENTS FOR OPTIONAL CHANGES TO THE FY 2011-2012 ANNUAL ACTION PLAN

1. Centralized or Coordinated Assessment System

- *If the recipient's jurisdiction, or a portion of the recipient's jurisdiction, currently has a centralized or coordinated assessment system and the recipient or sub-recipients utilize the centralized or coordinated assessment system, the recipient should describe the assessment system in the substantial amendment.*

All projects funded through the County of Kent will utilize the Centralized intake, assessment and referral mode. Our community's service delivery system includes a centralized intake, assessment and referral model. This coordinated single point of entry is critical to the process of how consumers consistently access and receive assistance when they experience a housing crisis. The model works effectively because service providers consistently access the centralized intake and referral services through the Salvation Army Booth Family Services system. Centralized Intake system is used in our community to:

- Provide a customer-service focus with consistent information and a streamlined approach.
- Target community resources appropriately.
- Minimize gaps and duplication in service delivery.
- Providers in our community use the strength-based model.

The process includes:

- An interview is conducted to determine housing status.
- Community Resources are reviewed for households who may be eligible for prevention or rapid re-housing.
- A referral is made to a provider/resource

2. Monitoring

• If existing monitoring procedures are not sufficient to allow recipients to monitor compliance with the new requirements, HUD encourages recipients to update their monitoring standards and procedures in the process of submitting this substantial amendment. This should address appropriate levels of staffing.

1. Existing monitoring procedures are sufficient to allow the Kent County Community Development Department to assure compliance.
2. All sub-recipients enter into written agreements. Each agreement details the requirements and outlines guidelines, objectives, and performance goals for the fiscal year. Sub-recipients are monitored on federal compliance requirement such as the document of income eligibility, timeliness of expenditures, and performance goals. Monitoring is performed by the Department of Community Development.